

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NO. CR-19-1631 KWR

WILLIE HORTON,

Defendant.

AMENDED PETITION FOR RELEASE FROM CUSTODY

COMES NOW Willie Horton, by and through Thomas Clark, Esq. and hereby move this Court for an order of release, and as reasons therefore submits the following:

1. The Defendant Willie Horton was arrested following an investigation alleging human trafficking at the Best Choice Inn in Albuquerque;
2. The Government filed a Motion to Detain Mr. Horton and other defendants on June 19, 2019;
3. Willie Horton waived his detention hearing on June 20, 2019 and remains in custody pending trial in this case;
4. Mr. Horton was an employee of the Best Choice Inn and is alleged by the Government to have acted in a manner consistent with human trafficking;
5. Mr. Horton has no ownership interest in the Best Choice Inn and is not alleged to have profited monetarily from the alleged activities at the Best Choice Inn;
6. Rather, Mr. Horton was a low level hourly employee who is alleged to have been acting on the orders of Defendant Bhula, the alleged owner of the property;
7. While Mr. Horton does have a significant criminal history, the Government is not alleging a violent criminal past;

8. Mr. Horton has previously been under supervision of the Court in multiple State Court proceedings, including the successful completion of pretrial services and Drug Court through the Second Judicial District Court;
9. While the current charges are very serious, they do not allege specific acts of violence;
10. As per 18 U.S.C. 3142 (g), Mr. Horton argues that the nature of the charges nor the weight of the evidence justify continue detention;
11. Likewise, the Defendant has significant ties to the community, has successfully been supervised in the Courts on at least two (2) separate occasions and simply does not pose a risk to the community if released at this time;
12. Alexander M. Uballez, AUSA, was contacted and opposes this motion.

WHEREFORE, for the foregoing reasons, Defendant respectfully requests this Court allow him to be released, approved by the supervising probation officer and requests this Court issue an order of release.

Respectfully Submitted,

/s/ Thomas M. Clark

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I hereby certify that on this 16th day of December, 2020, I filed the foregoing Pleading electronically through the CM/ECF System, and also served counsel of record for the United States with a copy of this pleading by electronic means.

/s/ Thomas M. Clark

Thomas M. Clark